

REMARKS/ARGUMENTS

I. General Remarks.

Applicants respectfully request that the Examiner reconsider the application in view of the following remarks.

II. Disposition of the Claims.

At the time of the Office Action, Claims 1-24 were pending in the application. Claims 1-24 were rejected. Claims 1, 4, 5, 10, 12-14, 16, 17, 21, 22, and 24 have been amended. Claims 25-40 have been added. Claims 3, 6-8, 11, 15, 18-20, and 23 have been canceled without prejudice or disclaimer.

III. Remarks Regarding Rejections Under 35 U.S.C. § 102.

A. Claims 1, 2, 4, 5, 9, 10, 12-14, 16, 17, 21, 22, and 24-40 are not Anticipated by the *Dodge* Reference.

Claims 1, 2, 4, 5, 9, 10, 12-14, 16, 17, 21, 22, and 24 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 4,608,086 issued to Dodge ("*Dodge*"). Applicants respectfully traverse these rejections for the reasons discussed below.

In order to establish a *prima facie* case of anticipation, all the elements of the claimed invention must be found within a single prior art reference. *Dewey & Almy Chemical Co. v. Mimex*, 124 F.2d 986, 52 USPQ 138 (2d Cir. 1942). Applicants respectfully submit that each and every element of Claims 1, 2, 4, 5, 9, 10, 12-14, 16, 17, 21, 22, and 24 are not found within the *Dodge* reference.

Claim 1, as amended, recites:

A method of removing an epoxy-based resin coating from a surface comprising applying a cleaning solution comprising a pH-adjusting agent, a solvent, and from about 35% to about 95% by volume water to a surface at least partially coated with an epoxy-based resin.

Applicants respectfully submit the *Dodge* reference fails to teach, suggest, or disclose each of these elements. For example, *Dodge* fails to teach, suggest, or disclose "a cleaning solution comprising . . . from about 35% to about 95% by volume water." Instead, *Dodge*

discloses a membrane remover/etchant solution having a total water level below 30% by weight. For at least this reason Claim 1 is allowable over the Dodge reference. Therefore, Applicants respectfully request that the rejection of Claim 1 be withdrawn.

Similar to Claim 1, Claim 13 also recites “[a] cleaning solution comprising . . . from about 35% to about 95% by volume water.” Therefore, Applicants submit that Claim 13 is also allowable over the *Dodge* reference, for example, for reasons similar to those discussed above with regard to Claim 1. Applicants respectfully request that the rejection of Claim 13 be withdrawn.

Claim 25 recites:

A method of removing a furan-based resin coating from a surface comprising applying a cleaning solution comprising a pH-adjusting agent, a solvent, and water to a surface at least partially coated with a furan-based resin.

Applicants respectfully submit the *Dodge* reference fails to teach, suggest, or disclose each of these elements as well. For example, *Dodge* fails to teach, suggest, or disclose “applying a cleaning solution . . . to a surface at least partially coated with a furan-based resin” (emphasis added). Instead, *Dodge* discloses using a membrane remover/etchant solution for use in removing curing membranes comprising chlorinated rubbers, oleo resins, acrylic resins or a combination of rubber and epoxy resin from concrete. Col. 1, ll. 35-42. *Dodge*, however, fails to teach, suggest, or disclose the use of its membrane remove/etchant solution to remove a furan-based resin coating from a surface. Therefore, for at least this reason, Applicants submit that Claim 25 is patentable over the *Dodge* reference, and respectfully request the full allowance of Claim 25.

Similar to Claim 25, Claim 33 recites a cleaning solution “suitable for use in cleaning a furan-based resin from a surface.” Therefore, Applicants respectfully submit that Claim 33 is also patentable over the *Dodge* reference, for example, for reasons similar to those discussed above with regard to Claim 25. Applicants respectfully request the full allowance of Claim 33.

Claims 2, 4, 5, 9, 10, and 12; 14, 16, 17, 21, 22, and 24; 26-32; and 34-40 each depend from Claims 1, 13, 25, and 33. Therefore, Applicants respectfully submit that Claims 2, 4, 5, 9, 10, and 12; 14, 16, 17, 21, 22, and 24; 26-32; and 34-40 are allowable over the cited art, for example, for reasons similar to those discussed above with regard to Claims 1, 13, 25, and 33.

Applicants respectfully request the withdrawal of the rejection of Claims 2, 4, 5, 9, 10, 12, 14, 16, 17, 21, 22, and 24 and the full allowance of all pending claims.

B. Claims 1, 2, 4, 5, 9, 10, 12-14, 16, 17, 21, 22, and 24-40 are not Anticipated by the *Doyel* Reference.

Claims Claims 1, 2, 4, 5, 9, 10, 12-14, 16, 17, 21, 22, and 24 were also rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,962,383 issued to Doyel ("*Doyel*"). Applicants respectfully traverse these rejections for the reasons discussed below.

In order to establish a *prima facie* case of anticipation, all the elements of the claimed invention must be found within a single prior art reference. *Dewey & Almy Chemical Co. v. Mimex*, 124 F.2d 986, 52 USPQ 138 (2d Cir. 1942). Applicants respectfully submit that each and every element of Claims 1, 2, 4, 5, 9, 10, 12-14, 16, 17, 21, 22, and 24 are not found within the *Doyel* reference.

Claim 1, as amended, recites:

A method of removing an epoxy-based resin coating from a surface comprising applying a cleaning solution comprising a pH-adjusting agent, a solvent, and from about 35% to about 95% by volume water to a surface at least partially coated with an epoxy-based resin.

Applicants respectfully submit the *Doyel* reference fails to teach, suggest, or disclose each of these elements. For example, *Doyel* fails to teach, suggest, or disclose "applying a cleaning solution . . . to a surface at least partially coated with an epoxy-based resin" (emphasis added). Instead, *Doyel* discloses applying a cleaning solution to a surface at least partially coated with polymers used in the manufacture of optical products. Col. 6, ll. 46-49. These include diethylene glycol bisallyl carbonate (DEGBAC), acrylates, methacrylates, methyl methacrylates, polyesters, polystyrene, polycarbonate, phthalate, isocyanate, polyether, urethane, thio or sulfur containing polymers, and halo or chlorine and/or bromine containing polymers. Col. 6, ll. 49-63. *Doyel* fails to teach, suggest, or disclose using the cleaning solution to remove an epoxy-based resin from a surface. For at least this reason, the rejection of Claim 1 is improper. Therefore, Applicants respectfully request that the rejection of Claim 1 be withdrawn.

Similar to Claim 1, Claim 13 recites a cleaning solution "suitable for use in cleaning an epoxy-based resin from a surface." Therefore, Applicants submit that Claim 13 is also allowable

over the *Doyel* reference, for example, for reasons similar to those discussed above with regard to Claim 1. Applicants respectfully request that the rejection of Claim 13 be withdrawn.

Claim 25 recites:

A method of removing a furan-based resin coating from a surface comprising applying a cleaning solution comprising a pH-adjusting agent, a solvent, and water to a surface at least partially coated with a furan-based resin.

Applicants respectfully submit the *Doyel* reference fails to teach, suggest, or disclose each of these elements as well. For example, *Doyel* fails to teach, suggest, or disclose “applying a cleaning solution . . . to a surface at least partially coated with a furan-based resin” (emphasis added). Instead, *Doyel* discloses a cleaning solution used to remove diethylene glycol bisallyl carbonate (DEGBAC), acrylates, methacrylates, methyl methacrylates, polyesters, polystyrene, polycarbonate, phthalate, isocyanate, polyether, urethane, thio or sulfur containing polymers, and halo or chlorine and/or bromine containing polymers. Col. 6, ll. 46-63. *Doyel* fails to teach, suggest, or disclose using the cleaning solution to remove a furan-based resin coating from a surface. Therefore, Applicants submit that Claim 25 is patentable over the *Doyel* reference, and respectfully request the full allowance of Claim 25.

Similar to Claim 25, Claim 33 recites a cleaning solution “suitable for use in cleaning a furan-based resin from a surface.” Therefore, Applicants respectfully submit that Claim 33 is also patentable over the *Doyel* reference, for example, for reasons similar to those discussed above with regard to Claim 25. Applicants respectfully request the full allowance of Claim 33.

Claims 2, 4, 5, 9, 10, and 12; 14, 16, 17, 21, 22, and 24; 26-32; and 34-40 each depend from Claims 1, 13, 25, and 33. Therefore, Applicants respectfully submit that Claims 2, 4, 5, 9, 10, and 12; 14, 16, 17, 21, 22, and 24; 26-32; and 34-40 are allowable over the cited art, for example, for reasons similar to those discussed above with regard to Claims 1, 13, 25, and 33. Applicants respectfully request the withdrawal of the rejection of Claims 2, 4, 5, 9, 10, 12, 14, 16, 17, 21, 22, and 24 and the full allowance of all pending claims.

SUMMARY

In light of the above remarks and amendments, Applicants respectfully request reconsideration and withdrawal of the outstanding rejections. Applicants further submit that the application is now in condition for allowance, and earnestly solicit timely notice of the same. Should the Examiner have any questions, comments or suggestions in furtherance of the prosecution of this application, the Examiner is invited to contact the attorney of record by telephone, facsimile, or electronic mail.

Applicants believe \$500.00 is due in association with the filing of this Amendment and Response. The Commissioner is hereby authorized to debit Deposit Account No. 08-0300 of Halliburton Energy Services, Inc. (Reference Number 2003-IP-012125U1) for this amount. Should the Commissioner deem that any other fees are due, including any fees for extensions of time, Applicants respectfully request that the Commissioner accept this as a Petition Therefor, and direct that any additional fees also be charged to Deposit Account No. 08-0300 (Reference Number 2003-IP-012125U1).

Respectfully submitted,



Robert A. Kent
Registration No. 28,626
Halliburton Energy Services, Inc.
2600 South Second Street
P.O. Drawer 1431
Duncan, OK 73536-0440
Telephone: 580-251-3125
ATTORNEY FOR APPLICANTS

Date: September 28, 2005